

September 30, 2021

Comments from Wolters Kluwer on the
United States Core Data for Interoperability, Version 3

Below are Wolters Kluwer's comments on additions to be made to Version 3 of the United States Core Data for Interoperability (USCDI). We appreciate the opportunity to share our views.

As way of background, Wolters Kluwer is a leading global provider of information, business intelligence and point-of-care solutions for the healthcare industry. Key solutions include UpToDate®, Medi-Span®, Lexicomp®, Facts & Comparisons®, Pharmacy OneSource®, Health Language®, Emmi® and POC Advisor®. Wolters Kluwer had annual revenue in 2020 of €4.6 billion.

Our comments reiterate several of the points we expressed in April when we submitted comments on the proposed Version 2. We believe these recommendations for new data elements continue to have merit and should be adopted for Version 3.

Clarification on *Encounter Type*

We again request ONC provide clarification on the proposed new *Encounter Type* data element. In FHIR, there are two different elements: *Encounter.type* and *Encounter.class*. USCDI describes this element as the classification for an encounter, such as inpatient or outpatient. This description more closely reflects the *Encounter.class* element in FHIR. To avoid confusion and create more accurate alignment when USCDI is translated to FHIR, we suggest changing the name of this element from *Encounter Type* to *Encounter Class*. We also recommend that *Encounter Class* have a set of standardized values in order to better promote interoperability. We recommend ONC adopt the HL7 v3 Value Set called ActEncounterCode (<http://www.hl7.org/fhir/v3/ActEncounterCode/vs.html>).

Recommended Additional Data Elements for Version 3

The recommended data elements listed below represent dates, codes, values and status in various classes, and have demonstrated extensive use in and exchange between certified systems. The inclusion of the *Immunizations* class of constituent elements seems particularly relevant given the nationwide vaccination effort currently underway. Specifically, ONC should include the following in version 3:

- *Laboratory*
 - *Laboratory Result Status*
 - *Laboratory Result Value*
 - *Laboratory results: date and timestamps*
 - *Laboratory Test Performed Date*
 - *Laboratory Test/Panel Code*
- *Immunizations*
 - *Immunization Administered Date -OR- Vaccine Administration Date (they seem to be redundant)*

- *Immunization Code*
 - *Immunization Status*
- *Medications*
 - *Date Medication Administered*
 - *Date Medication Prescribed*
 - *Dosage*
 - *Medication Administered Code*
 - *Medication Administration Dose*
 - *Medication Administration Dose Units*
 - *Medication Prescribed Code*
 - *Medication Prescribed Dose*
 - *Medication Prescribed Dose Units*
- *Procedures*
 - *Procedure Timing*
- *Vital Signs*
 - *Vital sign results: date and timestamps*

Recommendations from USCDI Task Force on Version 3

We reviewed the Version 3 recommendations submitted by the USCDI Task Force to the Health Information Technology Advisory Committee on September 9, 2021. While we agree with the general thrust of their recommendations, we want to particularly commend the Task Force for recommending future high priority use cases that should be the subject of new data elements and classes in USCDI. These include value-based care delivery, patient safety, cost and efficiency improvements including avoiding duplicative services, telehealth and remote care, precision medicine and digital quality measurement.

Future Use Cases for Priority Development

We commend the work of HL7's Gravity Project in building industry consensus on new data elements and classes related to social determinants of health (SDOH). Based on the Project's work, we recommend adding SDOH Social Care, SDOH Quality Measurement and SDOH Public Health to the list of high priority use cases that should be the subject of new data elements and classes in USCDI.

Thanks again for the opportunity to share our views. If you have questions or want to discuss our response in more detail, please contact Bob Hussey at bob@bobhussey.com or (612) 281-8741 who can connect you with the appropriate staff at Wolters Kluwer.